

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**IN RE: PANERA DATA SECURITY
LITIGATION**

This Document Relates To: All Cases

Master File No. 4:24-cv-00847

JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY

Plaintiffs Samantha Baldwin, Matthew Baldwin, Thomas Jones, Messiah Jordan Weddle, Gracelyn Donovan, Sydney Hollis, Robyn Campbell, Amanda Pharr, Forrest Cooley and Taslima Aktar (“Representative Plaintiffs”) and Defendant Panera, LLC (“Panera”), by and through their undersigned counsel, hereby submit this joint notice of settlement and motion to stay all case deadlines pending a decision on plaintiffs’ forthcoming motions for preliminary and final approval of such settlement.

On December 18, 2024, the parties participated in a mediation before mediator Jill Sperber of Judicate West, and since that time have continued discussions toward a potential resolution of this action.

As of the date of this joint notice, the parties have reached a settlement agreement to resolve this action with respect to the Representative Plaintiffs and a proposed settlement class. The parties anticipate that within 14 days of the date of this notice and motion, plaintiffs will file a motion for preliminary approval of the parties’ settlement agreement.

Accordingly, the parties hereby move for a stay of all case deadlines, including, but not limited to, Panera’s deadline to respond to the Consolidated Complaint (ECF No. 20), until such time as the Court determines whether to grant final approval of the parties’ settlement agreement.

Date: April 25, 2025

Respectfully submitted,

/s/ Daniel M. Kavouras

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CERTIFICATE OF SERVICE

Pursuant to E.D.Mo. L.R. 2.12, the undersigned hereby certifies that on April 25, 2025, a copy of the foregoing was filed using the Court's electronic filing system and by operation thereof served upon counsel to all parties.

/s/ Daniel M. Kavouras

Daniel M. Kavouras

Counsel for Defendant Panera, LLC